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September 1, 2015

**VIA ECF**

Honorable Lorna G. Schofield  
U.S. District Court  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, NY 10007

Re: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*  
Case No. 1:13-cv-07789-LGS (S.D.N.Y.)

Dear Judge Schofield:

Pursuant to this Court's Order dated March 23, 2015 (ECF No. 274) (the "March 23 Order"), Plaintiffs write jointly with the United States Department of Justice (the "DOJ") to express their positions with respect to discovery in the above-captioned case.

Plaintiffs have conferred with the DOJ with respect to discovery in this matter. Given the pendency of the DOJ's ongoing investigation, Plaintiffs have agreed with the DOJ to request extending the existing stay set forth in the Court's March 23 Order an additional six months, until March 23, 2016. Consistent with the Court's prior Orders on the subject, the DOJ will update the Court should circumstances change and evaluate a further stay request at the time such stay is to expire.

Plaintiffs propose one modification to the March 23 Order. Plaintiffs propose to modify the March 23 Order to permit Settling Defendants to produce documents to Plaintiffs pursuant to cooperation provisions in the settlement stipulations during this six-month period.<sup>1</sup> The DOJ takes no position on this request.

Likewise, Plaintiffs have conferred with the DOJ regarding redactions in the Second Consolidated Amended Class Action Complaint ("SAC"), pursuant to the Court's Order dated

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<sup>1</sup> The March 23 Order precluded "any production of documents." See ECF No. 274 at 2.

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July 31, 2015 (ECF No. 365). The DOJ has also requested, and Plaintiffs have agreed, that the chat transcripts and descriptions of chats included in Plaintiffs' SAC remain under seal at this time. Neither Plaintiffs nor the DOJ take any position as to whether any other material currently redacted in the SAC should remain under seal.

Very truly yours,

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CMB:pm